## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF VIRGINIA ABINGDON DIVISION

UNITED STATES OF AMERICA :

:

v. : Criminal No.: 1:16-cr-00007

:

STEVEN DONALD WOOD

## MOTION FOR DOWNWARD DEPARTURE BASED ON DEFENDANT'S SUBSTANTIAL ASSISTANCE IN THE INVESTIGATION AND PROSECUTION OF OTHERS

Comes now the United States of America, by counsel, and moves this Court to sentence the defendant below the sentencing guidelines range based on the defendant's substantial assistance in the investigation and prosecution of others. This motion is made pursuant to U.S. Sentencing Guidelines Manual § 5K1.1. and 18 U.S.C. § 3553(e).

Respectfully submitted,

JOHN P. FISHWICK, JR. United States Attorney

s/ Randy Ramseyer

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## CERTIFICATE OF SERVICE

I hereby certify that on 5/16/2016, I caused to be electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel for the defendant.

s/ Randy Ramseyer
Assistant United States Attorney